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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

ALL ACTIONS

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING TOLLING OF
APPLICABLE STATUTES OF
LIMITATION**

1 Pursuant to Civil Local Rule 7-12, Plaintiffs and Meta Platforms, Inc., Facebook
2 Holdings, LLC, Facebook Operations, LLC, Facebook Payments, Inc., Facebook Technologies,
3 LLC, Instagram LLC, and Siculus Inc. (“Meta Entities”); Snap Inc.; TikTok Inc. and ByteDance
4 Inc. (“TikTok Entities”); and YouTube, LLC, Alphabet Inc., and Google LLC (“Google Entities”)
5 (collectively “Defendants”) (together the “Parties”) by and through their counsel of record hereby
6 stipulate as follows:

7 WHEREAS, on October 6, 2022, the Judicial Panel on Multidistrict Litigation (“JPML”)
8 issued an order transferring multiple cases pursuant to 28 U.S.C. 1407 to the Northern District of
9 California as MDL No. 3047 (ECF No. 1);

10 WHEREAS, the Parties anticipate that the JPML will continue to issue conditional
11 transfer orders transferring other cases to this venue;

12 WHEREAS, in Case Management Order No. 1 (“CMO No. 1”), issued on November 10,
13 2022, this Court ordered the parties to meet and confer and to provide the Court with proposed
14 orders or recommendations to facilitate judicious resolution of, among other topics, the filing of a
15 master complaint and short form attachments by the next status conference set for December 14,
16 2022 (ECF No. 75);

17 WHEREAS, on November 17, 2022, Plaintiff Brittney Stoudemire filed a motion for
18 leave to amend her complaints to name additional specific Defendants (ECF No. 83);

19 WHEREAS, Plaintiff Stoudemire represented to Defendants and to the Court that she filed
20 these motions because statutes of limitation governing claims not currently asserted in her
21 complaints (including as against specific Defendants) continue to run;

22 WHEREAS, on November 21, 2022, Plaintiff Joleen Youngers filed a motion for leave to
23 amend her complaint to provide identifying information about the adult plaintiffs in her suit who
24 are presently identified by pseudonyms only (ECF No. 85);

25 WHEREAS, to avoid unnecessary motion practice seeking leave to amend complaints to
26 add claims or Defendants or to identify Plaintiffs by their full names, the Parties have met and
27 conferred and agreed, subject to Court approval, to the following:
28

- 1
2 1. With respect to Plaintiff Brittney Stoudemire and Plaintiffs in the *Younger* matter, all
3 applicable statutes of limitation relating to claims asserted against the undersigned
4 Defendants shall be tolled from November 22, 2022, until the deadline for filing short
5 form complaints for such Plaintiffs, and, if no deadline is set or applies, thirty days
6 after the filing of the master complaint;
- 7 2. For other Plaintiffs whose complaints have been filed in or transferred to MDL No.
8 3047 before Plaintiffs' master complaint is filed and who wish to file amended
9 complaints, counsel for any such Plaintiffs shall notify Liaison Counsel for Plaintiffs
10 and Defendants and meet and confer with Defendants regarding a tolling agreement.
11 To facilitate an efficient conferral process, any Plaintiff seeking a tolling agreement
12 shall in their initial request set out in writing the amendments for which they seek
13 tolling. Defendants and any Plaintiffs seeking a tolling agreement shall meet and
14 confer expeditiously and in good faith regarding any such request to avoid
15 unnecessary motion practice. If the Parties agree to tolling for the complaint in
16 question, the statutes of limitation shall be deemed tolled from the date the tolling was
17 requested until the deadline for filing short form complaints for such Plaintiffs, and, if
18 no deadline is set or applies, thirty days after the filing of the master complaint.
- 19 3. Subject to order of the Court, the motions for leave to amend filed at ECF Nos. 83 and
20 85 shall be denied without prejudice.

21 Dated: December 9, 2022

Respectfully submitted,

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23 LIEFF CABRASER HEIMAN
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*Attorneys for Defendants YouTube, LLC, Google LLC,
and Alphabet Inc.*

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2 **IT IS SO ORDERED.**

3
4 DATE: December 13, 2022


Hon. Yvonne Gonzalez Rogers

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8 **SIGNATURE CERTIFICATION**

9 Pursuant to Civ. L.R. 5-1(h)(3), I hereby attest that all signatories listed, and on whose
10 behalf the filing is submitted, concur in this filing's content and have authorized this filing.

11 Dated: December 9, 2022

/s/ Jennie Lee Anderson

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